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By ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Conti v. Doe*, No. 17-CV-9268 (VEC)

Your Honor:

We write to seek leave under the Court's Individual Rule 5.A to file Defendant's memorandum of law in opposition to Plaintiff's motion to exclude expert testimony with redactions on ECF, and to file three exhibits in support thereof under seal in their entirety. While Defendant does not believe that any redaction or sealing will be warranted once the Court has ruled on the pending motion, Defendant is requesting redactions and sealing temporarily and protectively, consistent with the Court's ruling on Plaintiff's request for redactions in his motion papers. Plaintiff consents to the proposed redactions and sealing.

The proposed redactions to the brief concern specific psychiatric conditions with which Plaintiff has been diagnosed. The sealed exhibits are a brief relevant excerpt of Plaintiff's psychiatric records and the diagnostic criteria for the conditions in question.

Respectfully,
/s/
Andrew G. Celli, Jr.
Katherine Rosenfeld

c. All counsel of record (by ECF)

Application GRANTED.

SO ORDERED.

Valerie Caproni
4/20/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE